

# UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

## In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Priority Mail parcel, Tracking Number 9505 5143 5011 3110 3670 04,  
addressed to John Rivers 57 forest Ave Cincinnati, OH 45220 with a  
return address of Jacob Soto 3119 Sierra Meadows Dr Bakersfield CA  
93313

Case No. 1:23-mj-351

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail parcel, Tracking Number 9505 5143 5011 3110 3670 04, addressed to John Rivers 57 forest Ave Cincinnati, OH 45220 with a return address of Jacob Soto 3119 Sierra Meadows Dr Bakersfield CA 93313

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of: Title 21

Code Section	Offense Description
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector (TFO) William N. Poole

- ☒ Continued on the attached sheet.
- ☐ Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*William N Poole*

Applicant's signature

William N. Poole, U.S. Postal Inspector (TFO)

Printed name and title

Sworn to before me and signed in my presence.  
via FaceTime video

Date: Apr 27, 2023

City and state: Cincinnati, Ohio

*Karen L. Litkovitz*  
Karen L. Litkovitz  
United States Magistrate Judge



**AFFIDAVIT**

I, William N. Poole, having been duly sworn, depose and state:

1. I currently serve as United States Postal Inspector Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS), assigned to the Cincinnati, Ohio Field Office. I have been a Task Force Officer with the United States Postal Inspection Service since September 16, 2022. I have investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. I am a certified Peace Officer by the State of Ohio. I am a Corporal with the Hamilton County Sheriff's Office and have been so employed since 2004. I completed Ohio Peace Officer Training Academy (OPOTA) through the Hamilton County Sheriff's Office in May of 2007. I am currently assigned to the Regional Enforcement Narcotics Unit (RENU) and have been so since July of 2016.
3. In January of 2017, I was selected to serve as a canine handler for RENU. I am currently a certified canine team with my canine partner "Akim." Canine Akim and I are certified as a team by the State of Ohio in the detection of marijuana, cocaine, heroin, methamphetamine, and their derivatives. Canine Akim and I have successfully assisted in the recovery of thousands of pounds of illegal narcotics for both State and Federal law enforcement agencies. I report that "Akim" passed all of his examinations and has successfully located hidden drugs in the past; I therefore consider "Akim" to be reliable.
4. During my tenure with RENU, I have received extensive training in parcel interdiction. I have served as the primary parcel investigator for RENU since 2019. I served as member of the Ohio Organized Crime Investigation Commission (OOCIC) for two years during 2020 through 2022, where my primary responsibility was parcel investigations. By virtue of my involvement in these investigations, I have become familiar with the various means and mechanisms used by narcotics traffickers to import and distribute controlled substances and to remain at large without being detected by law enforcement. I am familiar with the fact that drug traffickers make tremendous profits through drug trafficking and require large amounts of currency to operate surreptitiously. In this regard, I have obtained and executed numerous search warrants pursuant to which I have seized hundreds of pounds of narcotics and thousands of US dollars of ill-gotten gains through various shipping services throughout the Greater Cincinnati Area.
5. This Affidavit is made in support of a search warrant for the following property, namely the package associated with the following United States Postal Service ("USPS") Priority Mail Parcel bearing Tracking Number:

a. **9505 5143 5011 3110 3670 04** (the "**Subject Package**")

This Affidavit is made in support of a warrant to search the **Subject Package** for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the **Subject Package**, it does not include every fact known concerning this investigation. I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the **Subject Package**. The **Subject Package** is currently being held at the USPS Cincinnati Field Office.

6. Based on my training and experience, I have become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, I have learned of certain characteristics associated with other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include (but are not necessarily limited to or used on every occasion): false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity. I am aware that packages containing illegal narcotics can sometimes have correct return address or addressee information. Narcotics traffickers will use legitimate names of residents with or without their permission and knowledge in an attempt to conceal their illegal activities.
7. On or about April 26, 2023, I identified and intercepted the **Subject Package** from the Cincinnati Network Distribution Center (CNDC) located within the Southern District of Ohio.

The **Subject Package** is further described as:

**Priority Mail Parcel bearing Tracking Number: 9505 5143 5011 3110 3670 04**

Weighing approximately 5 pounds 13.70 ounces in USPS Large Flat Rate box. Postage paid was \$22.80.

**Sender:** Jacob Soto  
3119 Sierra Meadows Dr  
Bakersfield CA 93313

**Addressee:** John Rivers  
57 forest Ave  
Cincinnati, OH  
45220

8. I observed the **Subject Package** and reviewed USPS tracking information, which indicated it was mailed on April 20, 2023, at 12:37 pm (PST) from the Brundage Post Office located at 2525 E Brundage Ln Bakersfield, CA 93307-9998.
9. I searched the Accurant Virtual Crime Center database for the listed return address of the **Subject Package**. Accurant Virtual Crime Center is an investigative platform available to law enforcement and other government investigators that contains public-record data about people and businesses. The information obtained from the system indicated that Jacob Soto is not associated with the address.

10. I searched the Accurant Virtual Crime Center database for the listed addressee of the **Subject Package**. The information obtained from the system indicated John Rivers is not associated with the address.
11. On or about April 27, 2023, the **Subject Package** was placed in a location within the USPIS Cincinnati Field Office unknown to me. The **Subject Package** was placed in the office among several other similar packages. I retrieved my narcotics detection canine "Akim." "Akim" alerted positively to the presence or odor of a controlled substance upon the **Subject Package**. Attached to this Affidavit, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.
12. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Akim," is indicative of the **Subject Package** containing narcotics or proceeds relating thereof.
13. Based upon the information contained in this Affidavit, I believe that there is probable cause to believe that the **Subject Package** will contain evidence and/or contraband, fruits of crime, or other items illegally possessed. Therefore, a search warrant to open the **Subject Package** is requested.

Further, your Affiant sayeth naught.

William N Poole

William N. Poole  
U.S. Postal Inspector (TFO)

Subscribed and sworn to and before me this 27 day of April 2023.

Karen L. Litkovitz  
Karen L. Litkovitz  
United States Magistrate Judge





United States Postal Inspection Service  
Pittsburgh Division

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### OFFICER AFFIDAVIT

I, DEPUTY WILLIAM N. POOLE, AM, AND HAVE BEEN, EMPLOYED BY THE HAMILTON COUNTY SHERIFF'S OFFICE, SINCE 2004. I AM CURRENTLY A TASK FORCE OFFICER (TFO) WITH THE UNITED STATES POSTAL INSPECTOR SERVICE. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "AKIM", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

**Marijuana, Cocaine, Heroin, Methamphetamines, and their derivatives.**

ON 4/27/2023, THE FOLLOWING DESCRIBED ITEM WAS PLACED IN A LOCATION AT THE USPIS CINCINNATI FIELD OFFICE BY POSTAL INSPECTOR(S). I WAS UNAWARE OF THE LOCATION OF THE ITEM. "AKIM" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

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Priority Mail parcel, Tracking Number 9505 5143 5011 3110 3670 04, addressed to John Rivers 57 forest Ave Cincinnati, OH 45220 with a return address of Jacob Soto 3119 Sierra Meadows Dr Bakersfield CA 93313

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "AKIM", I CONSIDER THE ABOVE-DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

*William N Poole* 4/27/2023  
(Signature and Date)

Cincinnati Field Office  
895 Central Avenue, Suite 400  
Cincinnati, OH 45202-5748  
Telephone: 513-684-8060  
FAX: 513-684-8009